

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

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**In Re:**

**JOHN MALONE**

**Debtor**

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**Chapter 13  
Case No. 24-10885-CJP**

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**DEBTORS' MOTION TO EXTEND TIME TO COMPLETE ORDER TO  
UPDATE PETITION UNDER CHAPTER 13**

Now comes, John Malone, ("Debtor") by and through undersigned counsel, Glenn F. Russell, Jr., and who herein respectfully requests this Honorable Court for an extension of time to comply with this Honorable Court's Order to Update. In support thereof, the Debtor states as follows:

1. On, May 08, 2024, the Debtor filed an emergency petition under Ch. 13 of the United States Bankruptcy Code
2. Due to exigent circumstances involving the Debtor, the only documents filed with Honorable Court were, the Petition, Matrix of Creditors, Statement of Social Security Number, and Certificate of Credit Counseling.
3. On May 08, 2024, the Court issued Order to Update the petition (Doc. #7) with deadline of Wednesday May 22, 2024 to file.
4. Subsequent to the May 08, 2024 filing, undersigned has experienced unexpected conflicts of time in other matters, and has also has had significant time diverted required to prepare and try two matters, one before the Northeast Housing Court, and the other in the U.S. Court of Appeals for the First Circuit.
5. Additionally the Mass DOR has identified an issue, that undersigned has researched and could use additional time to work with the Massachusetts DOR to resolve.
6. Therefore, based upon the preceding the Debtor respectfully requests an extension up to and including June 05, 2024, in order to finish calculation to comply with this Court's Order to Update.

WHEREFORE, for all of the foregoing reasons, the Debtor, by and through his counsel, Glenn F. Russell, Jr., respectfully requests that the Court enter an Order allowing additional time up to and including June 05, 2024 to comply with this Court's Order to Update

Respectfully submitted,

Date: May 22, 2024

Attorney for the Debtor  
/s/ Glenn F. Russell, Jr.  
Glenn F. Russell, Jr.  
BBO# 656914  
38 Rock Street, Suite #12  
Fall River, MA 02720  
(888) 400-9318  
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CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 22<sup>nd</sup> day of May 2024, I served the Debtors' Motion to Extend time to Comply with this Court's Order to Update, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following:.

***Assistant U.S. Trustee***

**John Fitzgerald**

Office of the US Trustee  
J.W. McCormack Post Office &  
Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

***Trustee***

Carolyn Bankowski  
Ch 13-12 Trustee Boston  
P. O. Box 8250  
Boston, MA 02114  
617-723-1313

**Boston Water and Sewer Commission**

P.O. Box 55466  
Boston, MA 02205

**Boston Water and Sewer Commission**

P.O. Box 55466  
Boston, MA 02205

**City of Boston Real Estate Tax**

CITY OF BOSTON, BOX 55808  
Boston, MA 02205

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CITY OF BOSTON, BOX 55808  
Boston, MA 02205

**Discover Bank**

2479 Edison Blvd, Unity A  
Twinsburg, OH 44087-234

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2479 Edison Blvd, Unity A  
Twinsburg, OH 44087-234

**Fed Home Loan Mortgage Corp as Trustee**

26 Savin Hill Ave  
Dorchester, MA 02125

**Fed Home Loan Mortgage Corp as Trustee**

26 Savin Hill Ave  
Dorchester, MA 02125

**National Grid**

P.O. Box 371338  
Pittsburgh, PA 15250-7338

**National Grid**

P.O. Box 371338  
Pittsburgh, PA 15250-7338

**Specialized Loan Servicing, LLC**

Specialized Loan Servicing LLC  
P.O. Box 636005  
Littleton, CO 80163-6005

**The Bank of NY Mellon Indenture Trustee**

c/o Bank of America, N.A.  
475 Cross Point Pkwy PO Box 9000  
Getzville, NY 14068-9000

/s/ Glenn F. Russell, Jr.

Glenn F. Russell, Jr.